

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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| <b>In re:</b><br><br><b>PARADOX RESOURCES, LLC, <i>et al.</i>,</b><br><br><b>Debtors.<sup>1</sup></b> | §<br>§<br>§<br>§<br>§<br>§ | <b>Case No. 23-90558</b><br><br><b>Chapter 11</b><br><br><b>(Joint Administration Requested)</b> |
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**NOTICE OF DESIGNATION AS COMPLEX CASES**

On May 22, 2023, Paradox Resources, LLC, *et al.*, the above-captioned debtors and debtors in possession (the “Debtors”), filed voluntary petitions for relief (the “Chapter 11 Cases”) under chapter 11, title 11, of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court”). The undersigned proposed counsel believes that these Chapter 11 Cases qualify as complex cases because:

- ☒ The Debtors have total debt of more than \$10 million;
- ☒ There are more than 50 parties in interest in these Chapter 11 Cases;
- ☐ Claims against the Debtors are publicly traded;
- ☐ Other (Substantial explanation is required.)

Accordingly, the Debtors respectfully submit that the Procedures for Complex Chapter 11 Cases in the Southern District of Texas should apply.

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective Employer Identification Numbers, are as follows: Paradox Resources, LLC (7152); Paradox Midstream, LLC (2127); Paradox Upstream, LLC (0256); Capital Commercial Development, Inc. (3124); Neuhaus Barrett Investments, LLC (5529); Four Corners Energy, LLC (8159); and Four Corners Pipeline, LLC (8748). The Debtors’ service address is: 500 Dallas Street, Suite 1600, Houston, Texas 77002.

Respectfully submitted on the 22nd day of May, 2023.

**OKIN ADAMS BARTLETT CURRY LLP**

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**PROPOSED ATTORNEYS FOR THE  
DEBTORS**